

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**CASEY MULLINS, et al.**

\*

**Plaintiffs**

\*

vs.

\* **Civil Action No.: 1-02-CV-1634**

**OFFICER THOMAS JUGAN, et al.**

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**Defendants**

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**PLAINTIFFS JEREMY AND CASEY MULLINS PROPOSED VOIR DIRE**

1. If you or any member of your family is related by blood or by marriage to the following persons, or know them socially or have been their social guest on any occasion or they yours, or if you or any member of your family know or have been clients of any of the lawyers named, please stand, state your name and state the nature and extent of the relationship and acquaintance:

Parties:       Jeremy Mullins  
                  Casey Mullins  
                  6056 Red Squirrel Place  
                  Waldorf, Maryland 20603

                  Officer Thomas Jugan  
                  1620 Edison Highway  
                  Baltimore, Maryland 21213

Potential Witnesses: Robert Goble  
                          Tony Sistas  
                          Charlie Valare  
                          Tanya Kelly  
                          Sargent Gary Klado

Attorneys:     H. Jeffrey Tabb  
                  8955- A Edmonston Road  
                  Greenbelt, Maryland 20770

                  Troy A. Priest  
                  1010 Hull Street  
                  Baltimore, Maryland 21230

3. Would any member of the panel tend to believe the testimony of a police officer simply because he is a police officer, or not believe the testimony simply because he is a police officer?

4. Is a member of the panel employed or previously employed, in law enforcement, or a relative or close friend of a person employed or previously employed in law enforcement? Do you believe that you could fairly judge the evidence and follow the instructions of the court on the law in a case where a police officer is alleged to have acted improperly?

5. Has any member of the panel previously served on a jury? If yes, then what type of case and what was the result?

6. Does any member of the jury panel ever employed by an attorney? What is/was your position? and in what field of law?

7. Has any member of the jury panel had any legal training or education and how much training or education; and in what field of law?

8. Have you ever had any informal relationship with any police department or law enforcement agency, such as participation in a ride along program, membership in a crime watch program or similar activities?

9. Have you ever donated to, or participated in the collection of donations for the Fraternal Order of Police affiliated groups?

10. Are you a member of the Roper Committee or any group that advocates for the rights of the victims of crime?

11. Have you or any members of your immediate family or close friends, ever had any course of study in criminology, criminal justice or law enforcement?

12. Have you or any member of your immediate family ever worked for a town, municipal, county or state government?

13. Is any member of the jury panel employed by or has a close relative or friend that is employed by the Baltimore City Government? Do you feel that this would affect your ability to fairly judge the evidence and to follow the instructions of the court on the law?

14. Has any member of the jury panel, or a close relative or friend been a victim of crime? If yes, when and what was the nature of the crime?

15. Has any member of the panel been sued? If yes when, and what type of case? Do you believe you treated fairly? Has the experience prejudiced you in any way that you do not believe you can fairly judge the evidence and follow the court's instructions on the law?

16. Do any of you have any hearing problems? Do any of you suffer from any illness which, your believe, would make it difficult for you to sit as a juror?

17. Is there any other reason whatsoever why you would not be willing to sit as a juror in the trial or this case if you are selected?

Respectfully submitted,

/s/ H. Jeffrey Tabb  
H. Jeffrey Tabb  
8955-A Edmonston Road  
Greenbelt, Maryland 20770  
(301) 441-3636  
Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 25<sup>th</sup> day of February, 2005, a copy of the foregoing was mailed first class, postage prepaid, to:

Troy Priest, Esq.  
1010 Hull Street  
Baltimore, Maryland 21230

/s/ H. Jeffrey Tabb  
H. Jeffrey Tabb